

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

CHEW KING TAN, Individually and on Behalf of
All Others Similarly Situated,

Plaintiff,

v.

GOLDMAN SACHS GROUP INC. and
MORGAN STANLEY,

Defendants.

Case No.: 1:21-cv-08413-PAC

TRAVIS FLORIO, Individually and on Behalf of
All Others Similarly Situated,

Plaintiff,

v.

GOLDMAN SACHS GROUP INC. and
MORGAN STANLEY,

Defendants.

Case No.: 1:21-cv-08618-PAC

MICHAEL MERSON, Individually and on Behalf
of All Others Similarly Situated,

Plaintiff,

v.

GOLDMAN SACHS GROUP INC. and
MORGAN STANLEY,

Defendants.

Case No.: 1:21-cv-08752-PAC

MARK ULANCH, Individually and on Behalf of
All Others Similarly Situated,

Plaintiff,

v.

GOLDMAN SACHS GROUP INC. and
MORGAN STANLEY,

Defendants.

Case No.: 1:21-cv-08897-PAC

ALMA FELIX, Individually and on Behalf of All
Others Similarly Situated,

Plaintiff,

v.

GOLDMAN SACHS GROUP INC. and
MORGAN STANLEY,

Defendants.

Case No.: 1:21-cv-10286-PAC

ALISON SCULLY, Individually and on Behalf of
All Others Similarly Situated,

Plaintiff,

v.

GOLDMAN SACHS GROUP INC. and
MORGAN STANLEY,

Defendants.

Case No.: 1:21-cv-10791-PAC

KEVIN LEE, Individually and on Behalf of All
Others Similarly Situated,

Plaintiff,

v.

GOLDMAN SACHS GROUP INC. and
MORGAN STANLEY,

Defendants.

Case No.: 1:22-cv-00169-PAC

**NOTICE OF DEFENDANTS’
MOTIONS TO DISMISS THE SECOND AMENDED CLASS ACTION COMPLAINTS**

PLEASE TAKE NOTICE that, upon the accompanying Memorandum of Law, defendants Goldman Sachs Group, Inc. and Morgan Stanley (together, “defendants”) will move this Court for an order dismissing with prejudice the second amended class action complaints in

these coordinated actions, pursuant to Federal Rules of Civil Procedure 8(a), 9(b), and 12(b)(6), and the Private Securities Litigation Reform Act of 1995, 15 U.S.C. § 78u-4.

In accordance with the schedule set by the Court, plaintiffs' answering papers shall be filed on or before September 12, 2023, and defendants' reply papers shall be filed on or before October 12, 2023.

Defendants respectfully request oral argument on this motion.

Dated: July 18, 2023

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